

Ms. Isobella Wise
Wiltshire Council
By email

28th August 2026

PL/2026/04632 – 2 Market Place, Chippenham, SN15 3HE
Class MA Application for Change of Use of Ground Floor from Class E to Residential Use

Dear Isobella,

I am writing in response to the comments submitted by Chippenham Town Council in relation to the above application. I respectfully submit that a number of the concerns raised do not demonstrate an adverse impact sufficient to justify refusal of prior approval. I would therefore be grateful if the following representations could be taken into account when determining the application. I have structured the letter to address each of the points made by the Town Council.

1. Parking and sustainable transport

The Town Council accepts that the transport impacts of the proposal are not considered significant, specifically recognising the property's sustainable town-centre location and the proposed cycle store.

The submitted Planning Statement makes reference to the previously agreed cycle storage across the other permissions at the property. This facility can simply be enhanced to provide an additional three cycle storage spaces for the tenants of the ground floor. We would have no objection to the precise details of the cycle storage being secured by condition if considered necessary.

2. The suggestion that this would create a "dangerous precedent"

Class MA expressly allows for the change of use of Class E floorspace to residential use, including the ground floor within a Conservation Area, subject to the matters identified within paragraph MA.2 of the GPDO. As such, the Town Council's assertion that this is the first application of its kind of which it is aware, and that approval would therefore create a "dangerous precedent", should not in itself carry significant planning weight.

Each application must be determined on its individual circumstances and against the relevant Class MA criteria. Approval of this application would not establish that the loss of other ground floor commercial premises elsewhere in Chippenham would necessarily be acceptable.

3. The effect on the vitality and viability of Chippenham town centre

The Town Council's objection implies that retention of this ground floor commercial unit is necessary to maintain the vitality and viability of the town centre. A single unit within a diverse town centre environment cannot reasonably be equated with the loss of the commercial core itself.

As set out in the Planning Statement, the design of the former banking premises places it at a commercial disadvantage when compared with neighbouring commercial premises. HSBC vacated the building following expiry of its lease in August 2023 and the premises subsequently remained vacant until its acquisition by the applicant in November 2025.

The proposal responds pragmatically to the changing nature of the banking sector and wider town centre commercial market by securing a viable long-term use for the building.

There is no evidence within the Town Council's objection that the loss of this particular area of commercial floorspace would materially affect the functioning of Chippenham's commercial centre. Conversely, bringing the entire building back into active use would introduce additional residents into the heart of the town centre, supporting surrounding shops, cafés, restaurants etc.

4. The Conservation Area and the building's heritage significance

We fully acknowledge the importance of the building and the comments within the Chippenham Conservation Area Character Appraisal. However, it is important to distinguish between the architectural and visual significance of the building and its use.

The Town Council's quotation from the Character Appraisal principally describes the architectural quality of the building's Ionic classical frontage and its positive contribution to the street scene.

This application does not seek permission for any further external alterations beyond those already approved under planning permission PL/2025/09951. Those works were considered acceptable in terms of their effect upon the character and appearance of the Conservation Area.

The architectural significance of the building can therefore be retained irrespective of whether the ground floor is occupied for Class E or residential purposes. The fact that the building was originally constructed as a bank does not establish that its present or future use must remain commercial indefinitely. Historic buildings commonly evolve through different uses over time.

Turning now to the Town Council's reference to the property as a "Building of Good Townscape Merit". The Conservation Area Character Appraisal states:

"No. 2 (HSBC), although a narrow building, has an imposing ionic classical ground floor frontage befitting a bank and is a key positive feature of the space. The upper floors are faced in a different stone and share design details with No. 56/57 and thus it would appear that the bank frontage is a later addition to an earlier building."

The building is not featured in the Buildings of Local Merit Topic Paper, Appendix 16, updated February 2023 which is referenced within the Chippenham Neighbourhood Plan. Furthermore, the building is not identified as a Non Designated Heritage Asset under Policy TC5 of the Chippenham Neighbourhood Plan. A screenshot of Policy TC5 is shown on the following page for clarity. In any event, the architectural features described in the Character Appraisal will remain and the introduction of a residential use would not alter the architectural qualities which make the building a positive feature of the Conservation Area.

Policy TC5 - Buildings of Local Merit

The following buildings are important non-designated heritage assets:

- a. Reel Cinema, No. 91 Marshfield Road
- b. Nos. 63-66 New Road
- c. Nos. 31-33 High Street (Wilko)
- d. No. 1 Market Place (formerly Burtons)
- e. Chippenham Library, Timber Street
- f. The Citadel, Bath Road
- g. Nos. 1-10 Providence Terrace, Ivy Lane
- h. The Old Laundry chimney, Ivy Road
- i. 6 no. Second World War pillboxes, near the River Avon at Monkton Park Golf Course, No. 28 Sadlers Mead, Rawlings Farm, Rowden Farm, Milbourne Farm and Rowden Manor
- j. Nos. 17-25 Station Hill (former Palace Theatre)

The effect of a proposal on the significance of a Building of Local Merit will be taken into account to avoid or minimise harm.

5. The reference to the "Market Place" character area

The Town Council observes that the Character Appraisal identifies the potential for the loss of ground-floor commercial units to harm the vitality and viability of the high street. However, the wording of the Appraisal is more nuanced than the objection suggests. It states:

"There has been a recent increase in conversion of upper floors, and sometimes whole buildings, into residential in the Market Place. Whilst this can be a good thing which can add to the vibrancy of the area and natural surveillance, there are aspects which need careful consideration, such as loss of ground floor commercial units which could harm the vitality and viability of the high street, provision for refuse storage, and parking provision, particularly for cycles." [my emphasis]

The Appraisal therefore does not suggest that the conversion of ground floor commercial premises to residential use is unacceptable in principle. Rather, it identifies those matters which require consideration. In this case, appropriate refuse and cycle storage can be provided and the proposal would bring the entirety of a presently vacant building back into active use. The introduction of residents would itself contribute to activity, natural surveillance and expenditure within Market Place.

6. The assertion that residential use would "privatise" a publicly accessible commercial building

A commercial premises is not itself a public space. Access to a bank, office, shop, café or other commercial premises is dependent upon the operator, opening hours and the nature of the business. Fundamentally, the ground floor is currently vacant and is therefore not publicly accessible.

The proposed residential use would instead ensure that the building is occupied and maintained, with residents entering and leaving the building throughout the day.

7. A "dead frontage"

For the reasons set out in the Planning Statement, 2 Market Place has not historically made the same contribution to the vitality and activity of Market Place as neighbouring conventional retail premises, which benefit from wide glazed shopfronts and a much stronger visual relationship with the street.

The Town Council's position relies heavily upon the possibility that the previously approved alterations to the window cills could make the frontage more active were the building to remain in commercial use. However, those alterations do not fundamentally change the physical characteristics or architectural form of the building. The frontage remains very different from the conventional glazed retail shopfronts found elsewhere within Market Place.

8. Curtains and blinds

The suggestion that residential occupation would necessarily result in a less active frontage because residents may install blinds or curtains is speculative. It would therefore be disproportionate to conclude that the proposal would harm the character of the Conservation Area on the assumption that future residents might use curtains or blinds.

9. Potential alternative Class E uses

The Town Council identifies cafés, restaurants and offices as possible alternative uses. We do not dispute that these are theoretically possible. However, the existence of a theoretical alternative use does not establish that such a use would necessarily be deliverable or likely to occur at this particular property.

The examples given of former banks in Corsham, Malmesbury and Westbury demonstrate that individual former banking premises can find alternative uses, but they do not demonstrate equivalent commercial demand at 2 Market Place.

The fact that other former banks in Corsham, Malmesbury and Westbury have found alternative commercial uses does not demonstrate that the particular premises at 2 Market Place has an equivalent commercial demand. These towns are relatively isolated in their locations and as such have local night time economy demand for restaurants, cafes and bars. Chippenham town centre however, does not have the same appeal or demand. There is little in the way of night time economy which could be in part due to the close proximity of other centres i.e. Bath which can be accessed in 10 minutes by train. It is therefore unreasonable to make this comparison.

In this instance, the premises have been vacant since HSBC's departure in August 2023 and the proposed residential conversion provides an opportunity to secure the comprehensive and beneficial reuse of the building.

10. Conclusion

The Town Council's concerns are understood, particularly its desire to protect the vitality and viability of Chippenham town centre. However, the relevant question is whether the change of use of this particular ground-floor premises would result in an unacceptable impact having regard to the matters which may be considered under Class MA.

The proposal would retain the architectural qualities of the building and the frontage already approved under PL/2025/09951, whilst bringing the entirety of the building back into active use. The property can provide appropriate cycle and refuse provision, and the introduction of residents would itself contribute to activity, and expenditure within the town centre.

For these reasons, we do not consider that the Town Council's objection demonstrates that the proposal would adversely affect the character or sustainability of the Chippenham Conservation Area such that prior approval should be withheld.

Yours sincerely

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